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MARK F. DEVER
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April 5, 1996

BY HAND DELIVERY

William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

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APR 5 1996

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

Re: Written Ex Parte Presentation - PP Docket No. 93-253
Auction Number 5

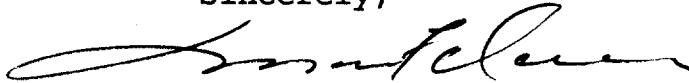
Dear Mr. Caton:

Cook Inlet Western Wireless PV/SS PCS, L.P. ("CIWWLP") hereby gives notice of a written ex parte presentation in the above-referenced proceeding. The presentation was made in the form of the attached letter.

CIWWLP delivered the attached letter to individuals in the Wireless Telecommunications Bureau and the Auctions Division.

Two copies of the letter are submitted herewith pursuant to Section 1.1206(a)(1) of the Commission's Rules, 47 C.F.R. § 1.1206(a)(1) (1994).

Sincerely,



Mark F. Dever

Enclosures

cc: Michele C. Farquhar
Kathleen O'Brien Ham
Louis Sigalos
Sue McNeil

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Cook Inlet Telecommunications, Inc.

1966 13th Street, Suite 280
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

April 4, 1996

BY HAND DELIVERY

Kathleen O'Brien Ham
Chief, Auctions Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W.
Washington, DC 20554

RE: Auction Number 5 Bidding Round Scheduling

Dear Ms. Ham:

Cook Inlet Western Wireless PV/SS PCS, L.P. ("CIWWLP") is pleased to submit its views on the scheduling of bidding rounds for the remainder of the broadband personal communications services C Block Auction (Auction number 5).

Specifically, CIWWLP encourages the Auctions Division to retain the current schedule of two rounds per day for the balance of the C Block Auction. Bidders for the 493 C Block licenses face considerable logistical demands in reviewing round results and evaluating market strategies and backup plans. For example, our partnership requires coordination daily with multiple partners in multiple geographic locations and multiple time zones. We and other bidders require sufficient time following each round to assimilate and analyze that round's bidding activity and to establish strategies, markets and bids for the next round. With the substantial interdependency of the C Block basic trading area licenses and the volume of information requires a full business day to analyze two rounds. Moving the auction to three rounds a day makes the decision-making process more difficult if not close to impossible to make informed decisions with 493 BTAs.

Retaining the current schedule of two rounds per day will help to reduce the occasion for erroneous bids. As has been witnessed during the progress of the C Block Auction, auction participants attempting to transmit bids for a number of licenses in a limited time may be more prone to submitting bids in error. Those erroneous bids

Kathleen O'Brien Ham
April 4, 1996
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Interrupt the natural development of the auction and demand the involvement of the Commission staff to address the mistake. Conducting more than two bidding rounds per day will likely exacerbate this problem. However, limiting bidding activity to twice per day will provide adequate time for all bidders to review and confirm their bid entries and will help to decrease the opportunities for bids submitted in error.

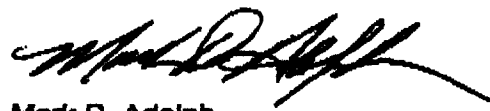
CIWWLP recognizes that the Commission might wish to speed the completion of the C Block Auction by holding more than two bidding rounds per day. However, as the Commission reasoned in the competitive bidding Second Report and Order:

In determining the appropriate pace of the auction, we must trade off the benefits of rapidly completing the auction -- possibly earlier initiation of service -- against the benefits of providing bidders time to deliberate. With large numbers of high value licenses that may be combined across spectrum blocks and regions, bidders may need a significant amount of time to evaluate backup strategies and consult with their principals.

Implementation of Section 309(j) of the Communications Act - Competitive Bidding. Second Report and Order, 9 FCC Rcd 2348, 2368 (1994). In this instance, C Block license values are quite high and interdependent and Auction participants need sufficient time to deliberate and to evaluate bidding strategies. Rather than conduct more than two bidding rounds per day, the Auction Division should rely on the established bidding activity rules to maintain the pace of the C Block Auction.

For these reasons CIWWLP urges the Auctions Division to retain the current schedule of two rounds per day for the balance of the C Block Auction.

Sincerely,
Cook Inlet Western Wireless PV/SS PCS, L.P.



Mark D. Adolph
Vice President of CIWWLP
Control Group General Partner,
Cook Inlet Telecommunications, Inc.

cc: Michele C. Farquhar
Louis Sigalos
Sue McNeil